



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 24, 2021

BY EMAIL

ORDER ENDORSED

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Frederick L. Scheinin, 20 Cr. 133 (JSR)*

Dear Judge Rakoff:

At the start of trial in the above-captioned case, the Court directed the parties to confer regarding the trial exhibits that should only be released to the public and/or press in redacted form. The parties respectfully submit this letter, requesting that the Court prohibit the release of certain below-listed exhibits or pages of exhibits in unredacted form.

The exhibits listed below include (1) depictions of the defendant's genitals or pubic area, (2) the defendant's personally identifying information, (3) depictions of the undercover detective's face, and (4) depictions of a suspected victims' faces and bodies. The parties respectfully submit that the presumption of public access is outweighed by the defendant's and his heirs' privacy interests; the safety risk to the undercover detective who continues to operate in an undercover capacity; and the privacy interests of minor, third-party victims. The exhibits the parties wish to subject to redactions before they are made available to the press or public are:

- GX 13-A;
- Pages 437-38, 463, 473-74, 477-78, 517-20, 525-28, and 563-64 of GX 14 (as well as the corresponding pages of the sub-exhibits: pages 222-23 of GX 14-A; pages 222-23 of GX 14-B; pages 20-21, 24-25, and 42 of GX-14-C; pages 20-21, 24-25, and 42 of GX 14-D; and pages 11, 12, and 15 of GX 14-E);
- GX 26;
- GX 29;
- GX 51;
- GX 53;
- GX 54;
- GX 62;
- GX 110-C;
- GX 110-L;
- GX 205; and

- GX 206.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/
Nicholas W. Chiuchiolo / Daniel G. Nessim
Assistant United States Attorneys
(212) 637-1247 / 2486

cc: Tamara Giwa, Esq., and Sylvie Levine, Esq.

SO ORDERED

USDA
6-24-21